

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

FREE SPEECH COALITION, INC., MG  
PREMIUM LTD, MG FREESITES LTD,  
WEBGROUP CZECH REPUBLIC, A.S.,  
NKL ASSOCIATES, S.R.O., SONESTA  
TECHNOLOGIES, S.R.O., SONESTA  
MEDIA, S.R.O., YELLOW PRODUCTION  
S.R.O., PAPER STREET MEDIA, LLC,  
NEPTUNE MEDIA, LLC, JANE DOE,  
MEDIAME SRL, MIDUS HOLDINGS,  
INC.

Plaintiffs,

vs.

ANGELA COLMENERO, IN HER  
OFFICIAL CAPACITY AS INTERIM  
ATTORNEY GENERAL FOR THE STATE  
OF TEXAS,

Defendant.

Case No.: 1:23-cv-917

**DECLARATION OF ANDREAS ALKIVIADES ANDREOU IN SUPPORT OF  
PLAINTIFFS' MOTION FOR EXPEDITED PRELIMINARY INJUNCTION**

I, Andreas Alkiviades Andreou, declare as follows:

1. I provide this declaration in support of the Motion for Expedited Preliminary Injunction against enforcement of the Act of June 12, 2023, Ch. 676, § 2 (H.B. 1181) Tex. Sess. Law Serv. (“the Act”). I am over eighteen years of age, and I have personal knowledge of the matters set forth in this Declaration; if called as a witness I could and would testify competently to these matters.

**MG FREESITES LTD**

2. I hold the position of Director at MG Freesites Ltd, a private limited liability company organized under the laws of the Republic of Cyprus, that operates the website Pornhub.com (“Pornhub”).

3. Pornhub is a website that hosts adult content created by individual creators and studios from around the world. Pornhub is available to the entire world of internet users, setting aside age or country censorship filters, and is available in almost all countries. The content on Pornhub is available to users free of charge. Pornhub makes money through advertising placements on its website and through referral fees generated from certain advertisements placed by third party content creators. Advertising revenue is also shared with third party content creators and individual creators.

4. Pornhub strongly disagrees with the statements that the Act would require it to make on its website:

TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography is potentially biologically addictive, is proven to harm human brain development, desensitizes brain reward circuits, increases conditioned responses, and weakens brain function. TEXAS HEALTH AND HUMAN SERVICES WARNING: Exposure to this content is associated with low self-esteem and body image, eating disorders, impaired brain development, and other emotional and mental illnesses. TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography increases the demand for prostitution, child exploitation, and child pornography.

5. Pornhub also strongly disagrees with the Act’s requirement to post the following message at the bottom of every webpage:

U.S. SUBSTANCE ABUSE AND MENTAL HEALTH SERVICES ADMINISTRATION HELPLINE: 1-800-662-HELP (4357) THIS HELPLINE IS A FREE, CONFIDENTIAL INFORMATION SERVICE (IN ENGLISH OR SPANISH) OPEN 24 HOURS PER DAY, FOR INDIVIDUALS AND FAMILY MEMBERS FACING MENTAL HEALTH OR SUBSTANCE USE DISORDERS. THE SERVICE PROVIDES REFERRAL TO LOCAL TREATMENT FACILITIES, SUPPORT GROUPS, AND COMMUNITY-BASED ORGANIZATIONS.

6. Pornhub cooperates with parental filtering software by including a meta tag in its coding that designates its content as “RTA” (Restricted to Adults). By including this meta tag, parental control filters can easily identify Pornhub as an adult content site and block access.

7. The Terms and Conditions for Pornhub make clear that individuals under the age of eighteen are not authorized to access the website.

#### **MG PREMIUM LTD**

8. I hold the position of Director at MG Premium Ltd, a private limited liability company organized under the laws of the Republic of Cyprus, that operates the websites SpiceVids.com (“SpiceVids”), Brazzers.com (“Brazzers”), and FakeTaxi.com (“FakeTaxi”).

9. SpiceVids is a website that hosts adult content uploaded by studios from around the world. It is available to the entire world of internet users, setting aside age or country censorship filters, and is available in almost all countries. The content on SpiceVids is available only on a subscription basis, where adults can purchase a subscription to access to full length, high quality videos available on the website.

10. Brazzers is a website that hosts adult content in which MG Premium Ltd holds all the intellectual property rights. For shoots with adult performers, MG Premium Ltd writes the scripts, hires the production team, and does the pre- and post-production work. Brazzers is available to the entire world of internet users, setting aside age or country censorship filters, and is available in almost all countries. The content on Brazzers is available only on a subscription basis, where adults can purchase a subscription to access to full length, high quality videos available on the website. MG Premium Ltd uploads Brazzers also makes some of the content

available on Brazzers.com available to other adult websites, including Pornhub, xvideos.com, xnxx.com, and SpiceVids.

11. FakeTaxi is a website that hosts adult content produced by Yellow Production, s.r.o. It is available to the entire world of internet users, setting aside age or country censorship filters, and is available in almost all countries. The content on FakeTaxi is available only on a subscription basis, where adults can purchase a subscription to for access to full length, high quality videos available on the website.

12. Brazzers, SpiceVids, and FakeTaxi strongly disagree with the statements that the Act would require them to make on their websites and advertisements:

TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography is potentially biologically addictive, is proven to harm human brain development, desensitizes brain reward circuits, increases conditioned responses, and weakens brain function. TEXAS HEALTH AND HUMAN SERVICES WARNING: Exposure to this content is associated with low self-esteem and body image, eating disorders, impaired brain development, and other emotional and mental illnesses. TEXAS HEALTH AND HUMAN SERVICES WARNING: Pornography increases the demand for prostitution, child exploitation, and child pornography.

13. Advertisement assets are typically designed using a 300x250 pixel frame, where short video clip (10-20 sec) or static graphic banner ads are used. Adding the above-quoted text to the advertisements would be impracticable and dwarf the websites' ads themselves.

14. Brazzers, SpiceVids, and FakeTaxi also strongly disagree with the Act's requirement to post the following message at the bottom of every webpage:

U.S. SUBSTANCE ABUSE AND MENTAL HEALTH SERVICES ADMINISTRATION HELPLINE: 1-800-662-HELP (4357) THIS HELPLINE IS A FREE, CONFIDENTIAL INFORMATION SERVICE (IN ENGLISH OR SPANISH) OPEN 24 HOURS PER DAY, FOR INDIVIDUALS AND FAMILY MEMBERS FACING MENTAL HEALTH OR SUBSTANCE USE DISORDERS. THE SERVICE PROVIDES REFERRAL TO LOCAL TREATMENT FACILITIES, SUPPORT GROUPS, AND COMMUNITY-BASED ORGANIZATIONS.

15. Brazzers, SpiceVids, and FakeTaxi cooperate with parental filtering software by including a meta tag in its coding that designates their content as "RTA" (Restricted to Adults).

By including this meta tag, parental control filters can easily identify these sites as adult content sites and block access.

16. The Terms and Conditions for Brazzers, SpiceVids, and FakeTaxi make clear that individuals under the age of eighteen are not authorized to access the website. Individuals attempting to access Brazzers, SpiceVids, and FakeTaxi are first barred by a pop-up requiring them to certify that they are at least eighteen years old before they can enter the websites.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 1, 2023 in Nicosia, Cyprus.

Dated: August 1, 2023

/s/ *Andreas Alkiviades Andreou*  
Andreas Alkiviades Andreou